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12 Attorneys for United States of America

13  
14 UNITED STATES DISTRICT COURT  
15  
16 NORTHERN DISTRICT OF CALIFORNIA  
17  
18 OAKLAND DIVISION

19 UNITED STATES OF AMERICA,

20 ) CASE NO. CR 13-0554 JST

21 Plaintiff,

22 ) STIPULATION AND ~~PROPOSED~~ ORDER  
23 ) EXCLUDING TIME UNDER 18 U.S.C. § 3161

24 v.

25 ) Date: February 14, 2014

26 GUILLERMO ESPARZA,

27 ) Time: 9:30 a.m.

28 Defendant.

29 )

30 The above-captioned matter is set on February 14, 2014 at 9:30 a.m. before this Court for a status  
31 appearance. The parties have actively been in plea negotiations and have reached a tentative plea  
32 agreement; however, defense counsel needs additional time to meet with Defendant to go over the draft  
33 plea agreement. For this reason, the parties request that this Court continue the status hearing and set a  
34 change of plea date to March 21, 2014 at 9:30 a.m.

35 The Court has previously excluded the running of the speedy trial clock for effective preparation  
36 of counsel, 18 U.S.C. 3161(h)(7)(B)(iv), through February 14, 2014. Therefore, the parties now request  
37 that the time between February 14, 2014 and March 21, 2014 be excluded from the running of the  
38 speedy trial clock for effective preparation of counsel, 18 U.S.C. 3161(h)(7)(B)(iv). The parties agree  
39 STIP TO CONTINUE

1 that, taking into account the public interest in prompt disposition of criminal cases, good cause exists for  
2 this extension due to the anticipated plea agreement and defense counsel's need to discuss it and advise  
3 her client. The parties also agree that the ends of justice served by granting such a continuance  
4 outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C. 3161(h)(7)(A).

5 SO STIPULATED:

6 MELINDA HAAG  
7 United States Attorney

8  
9 DATED: February 10, 2014

/S/  
10 NATALIE LEE  
11 Assistant United States Attorney

12 DATED: February 10, 2014

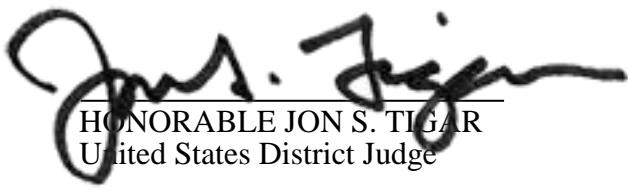
/S/  
13 ELLEN LEONIDA  
14 Attorney for Guillermo Esparza

15 For the reasons stated above, this matter is continued until March 21, 2014, for a change of plea.,

16 The Court finds that the exclusion of time from February 14, 2014 through March 21, 2014 is warranted  
17 and that the ends of justice served by the continuance outweigh the best interests of the public and the  
18 defendants in a speedy trial. 18 U.S.C. 3161 (h)(7)(A). The failure to grant the requested continuance  
19 would deny the defendant effective preparation of counsel and continuity of counsel. 18 U.S.C.  
20 3161(h)(7)(B)(iv).

21 SO ORDERED.

22 DATED: February 11, 2014

  
23 HONORABLE JON S. TIGAR  
24 United States District Judge